STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Shuqualak Lumber Company Inc, Planer Mill Division
402 Oak Street
Shuqualak, Mississippi
Noxubee County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

____
AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: **Permit No.: 2000-00013**

SECTION 1. GENERAL CONDITIONS

1.1 This permit is for air pollution control purposes only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)

1.1 Any activities not identified in the application are not authorized by this permit.

(Ref.: Miss. Code Ann. 49-17-29(1)(b))

1.2 The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

1.3 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)

1.4 The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

1.5 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)

1.6 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

1.7 The permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

1.8 The permittee shall furnish to the Department of Environmental Quality (DEQ) within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

1.9 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(1)-(3).)

1.10 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

1.11 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

1.12 *General Nuisances:* The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

(a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

(b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C.)

1.13 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

(a) To enter at reasonable times upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

(b) To have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

(Ref.: Miss. Code Ann. 49-17-21)

1.14 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

(a) Persistent violation of any of the terms or conditions of this permit;

(b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

(c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)

1.15 *Public Record and Confidential Information:* Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

1.16 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

1.17 *Severability:* The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)

1.19 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)

1.20 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)

1.21 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

1.22 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

1.23 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

(a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through

properly signed contemporaneous operating logs or other relevant evidence the following:

(i) An upset occurred and that the source can identify the cause(s) of the upset;

(ii) The source was at the time being properly operated;

(iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;

(iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.

(2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.

(3) This provision is in addition to any upset provision contained in any applicable requirement.

(4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

(b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.

(2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

(3) Where an upset, as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.,occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

1.24 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

1.25 *Compliance Testing:* Regarding compliance testing:

(a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

(b) Compliance testing will be performed at the expense of the permittee.

(c) Each emission sampling and analysis report shall include but not be limited to the following:

(1) detailed description of testing procedures;

(2) sample calculation(s);

(3) results; and

(4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

SECTION 2. EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

Emission Point	Description
AA-000	Facility-Wide (Shuqualak Lumber Company Inc, Planer Mill Division)
AA-106	Steam-Heated Batch Lumber Drying Kiln D
AA-109	Steam-Heated Batch Lumber Drying Kiln E
AA-110	Steam-Heated Batch Lumber Drying Kiln F
AA-111	32.4 MMBTU/Hour Natural Gas-Fired Boiler
AA-113	32.4 MMBTU/Hour Natural Gas-Fired Boiler
AA-114	Steam-Heated Continuous Lumber Drying Kiln

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (smoke)	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM (filterable)	$E = 4.1 \cdot (p^{0.67})$
AA-106 AA-109 AA-110 AA-114	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). **(PSD Avoidance Limit)**	3.4	VOCs	4.09 lb / MBF 350.92 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). **(PSD Avoidance Limit)**	3.5	Lumber Throughput	171,600.0 MBF / Year (Rolling 12-Month Total)
	40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products 40 CFR 63.2231, 63.2233(a)(2) and (e); Subpart DDDD	3.6	HAPs	General Applicability
AA-111 AA-113	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). **(PSD Avoidance Limit)**	3.7	Natural Gas Throughput	320.0 MMscf / Year (Rolling 12-Month Total)

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke into the open air from a point source or from any manufacturing / industrial process on-site that exceeds forty (40) percent opacity subject to the following exceptions:

(a) Start-up operations may produce emissions that exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that the aggregation duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any (1) one hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

3.3 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combinations thereof) to exceed the amount determined by the relationship:

$$E = 4.1 \cdot (p^{0.67})$$

Where "E" is the emission rate in pounds per hour and "p" is the process weight input rate in tons per hour. Conveyer discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)

3.4 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 4.09 pounds per thousand board feet (MBF) dried and no more than 350.92 tons per year (tpy) based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). – PSD Avoidance Limit)

3.5 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee shall limit the total throughput of lumber dried from all kilns to no more than 171,600.0 MBF per year based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). – PSD Avoidance Limit)

3.6 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee is subject to all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions.

Emission Points AA-106, AA-109 and AA-110 must comply with the work practice requirements in Section 4 beginning on July 6, 2029. Emission Point AA-114 must comply with the work practice requirements in Section 4 beginning on July 6, 2026 or upon initial startup, whichever is later.

(Ref.: 40 CFR 63.2231, 63.2233(a)(2) and (e); Subpart DDDD)

3.7 For Emission Points AA-111 and AA-113, the permittee shall limit the total natural gas throughput in both boilers to no more than 320.0 million standard cubic feet (MMscf) per year based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). – PSD Avoidance Limit)

SECTION 4. WORK PRACTICES

4.1 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee must minimize lumber over-drying to reduce HAP emissions by meeting the requirements in Conditions 4.2 and 4.3 by July 6, 2026 for Emission Point AA-114 and July 6, 2029 for Emission Points AA-106, AA-109 and AA-110.

(Ref.: 40 CFR 63.2241(e); Subpart DDDD)

4.2 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee shall develop and maintain onsite an operation and maintenance (O&M) plan for the lumber kilns at the facility. The O&M plan must include the kiln maintenance, charge optimization, inspection, and corrective action elements specified below:

(a) Procedures for maintaining the integrity of lumber kiln internal air flow and heat distribution components (such as baffles, fans, vents, heating coils, or temperature sensors) to provide as uniform a temperature and air flow as reasonably possible.

(b) Charge optimization practices to reduce over drying.

(c) At least annually, inspect the lumber kiln integrity and review the charge optimization practices used. The permittee must implement corrective actions as needed and maintain records of the inspections and corrective actions taken.

(1) The initial inspection of kiln integrity must be completed by July 6, 2026 for Emission Point AA-114 and July 6, 2029 for Emission Points AA-106, AA-109 and AA-110. After the initial inspection, each annual inspection is required to be completed no more than 13 months after the previous inspection.

(2) Corrective actions must be initiated within 30 days after the inspection and completed within 180 days following the inspection identifying the need for the corrective action. If the corrective action cannot be completed within 180 days, a written request for an extension may be submitted to the MDEQ.

(d) After the compliance dates outlined in Condition 4.1, any updates made to the O&M plan maintained onsite must be described in the semiannual compliance report as outlined in Condition 6.4. The MDEQ may require modification of the O&M plan, as needed, upon review.

(Ref.: 40 CFR 63.2241(e)(1) and 63.2253(a); Subpart DDDD)

4.3 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee shall minimize lumber over-drying by operating according to one of the work practice options below:

(a) ***Temperature limit option.*** Operate the lumber kiln with a maximum dry bulb temperature limit of no more than 210 °F for batch indirect fired (IF) kilns and 245 °F for continuous IF kilns. The permittee must continuously monitor and record the dry bulb temperature during the kiln drying cycle according to Condition 5.5 and maintain the batch cycle average dry bulb temperature (for batch kilns) or daily block average dry bulb temperature (for continuous kilns) below the maximum limit specified in this paragraph according to Condition 5.9.

(b) ***Hybrid option.*** Operate the lumber kiln according to the paragraphs below:

(1) Operate the lumber kiln with a maximum dry bulb temperature limit of no more than 240 °F for batch indirect fired (IF) kilns and 260 °F for continuous IF kilns. The permittee must continuously monitor and record the dry bulb temperature during the kiln drying cycle according to Condition 5.5 and maintain the batch cycle average dry bulb temperature (for batch kilns) or daily block average dry bulb temperature (for continuous kilns) below the maximum limit specified in this paragraph according to Condition 5.9.

(2) Operate the kiln to dry to a semiannual average lumber moisture content (weight percent, dry basis) at or above the minimum limit of moisture content considered to be over-dried lumber as specified in paragraph (d) of this condition and Table 11 of Subpart DDDD. Lumber moisture must be monitored and recorded according to Condition 5.6. The semiannual average must be determined according to Condition 5.10.

(c) ***Site-specific plan option.*** Develop and operate according to a site-specific plan to minimize lumber over-drying through temperature and lumber moisture monitoring as required in the paragraphs below. The site-specific plan must be submitted to the MDEQ for approval by January 6, 2028 and the site-specific limits from the plan must be incorporated into the facility's Title V operating permit when the Title V permit is next reopened for cause or renewed, as applicable.

(1) The site-specific plan must identify one temperature parameter (such as wet or dry bulb temperature, wet bulb depression, or temperature drop across the load) to be continuously monitored during the kiln drying cycle; include a description of how the temperature parameter is measured and used to minimize over-drying of lumber; and include a site-specific limit for the temperature parameter that minimizes over-drying. The permittee must continuously monitor and record the temperature parameter according to Condition 5.5 and calculate the 3-hour block average for

comparison to the site-specific temperature limit according to Condition 5.10.

(2) The site-specific plan must include a method for monitoring lumber moisture content (weight percent, dry basis); specify the location of such monitoring within the lumber manufacturing process (for example, at the kiln unloading track, in lumber storage, or at the planer); specify the minimum kiln-dried lumber moisture content limit based on the lumber moisture specifications produced at the facility based on paragraph (d) of this condition and Table 11 of Subpart DDDD; and adhere to the minimum data and lumber moisture content averaging requirements in Condition 5.7 and Condition 5.11.

(3) The written site-specific plan must be maintained onsite at the facility and is enforceable upon the compliance date specified in Condition 3.6. After the compliance date, deviations from the site-specific plan must be reported according to Condition 6.4. Any updates made to the site-specific plan must be approved by the MDEQ, and any updates to the site-specific limits from the plan must be incorporated into the facility's Title V permit when the Title V permit is next reopened for cause or renewed, as applicable.

(d) *Over-dried lumber.* The "maximum lumber moisture specification" means the upper limit of lumber moisture content (weight percent on a dry basis) that meets the relevant lumber grade standard for a lumber product. For each maximum lumber moisture specification, Table 11 of Subpart DDDD provides the corresponding minimum kiln-dried lumber moisture content limits below which lumber is considered to be over-dried for purposes of Subpart DDDD.

(Ref.: 40 CFR 63.2241(e)(3), (4) and 63.2253(b); Subpart DDDD)

4.4 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee must always operate and maintain the kilns, including monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by Subpart DDDD. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.2250(g); Subpart DDDD)

SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

<table>
<tr><th>Emission Point</th><th>Applicable Requirement</th><th>Condition Number(s)</th><th>Pollutant/ Parameter</th><th>Monitoring/Recordkeeping Requirement</th></tr>
<tr><td rowspan="2">AA-000 (Facility-Wide)</td><td>11 Miss. Admin. Code Pt. 2, R. 2.9.</td><td>5.1</td><td>Recordkeeping</td><td>Maintain Records for a Minimum of 5 Years.</td></tr>
<tr><td>40 CFR 52.21(r)(6)(iii); Subpart A</td><td>5.2</td><td>$PM_{2.5}$
NO_x
VOCs
CO</td><td>Calculate Project-Related Emission Increases</td></tr>
<tr><td rowspan="10">AA-106
AA-109
AA-110
AA-114</td><td>11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).</td><td>5.3</td><td>Lumber Throughput</td><td>Monitor Lumber Throughput of the Kilns
(Monthly and Rolling 12-Month Total)</td></tr>
<tr><td>40 CFR 63.2269(a); Subpart DDDD</td><td>5.4</td><td>HAPs</td><td>Temperature/Moisture Monitor Requirements</td></tr>
<tr><td>40 CFR 63.2269(b) and (m); Subpart DDDD</td><td>5.5</td><td>Temperature</td><td>Temperature Monitor Requirements</td></tr>
<tr><td>40 CFR 63.2269(n); Subpart DDDD</td><td>5.6</td><td>Lumber Moisture</td><td>Measurement Requirements for the Hybrid Option</td></tr>
<tr><td>40 CFR 63.2269(o); Subpart DDDD</td><td>5.7</td><td>Lumber Moisture</td><td>Measurement Requirements for the Site-Specific Plan Option</td></tr>
<tr><td>40 CFR 63.2270(b): Subpart DDDD</td><td>5.8</td><td>Temperature/ Moisture</td><td>Data Collection Requirements</td></tr>
<tr><td>40 CFR 63.2270(h)(1); Subpart DDDD</td><td>5.9</td><td>Dry Bulb Temperature</td><td>Requirements for the Temperature Limit Option or Hybrid Option</td></tr>
<tr><td>40 CFR 63.2270(i); Subpart DDDD</td><td>5.10</td><td>Lumber Moisture</td><td>Requirements for the Hybrid Option</td></tr>
<tr><td>40 CFR 63.2270(h)(2) and (j); Subpart DDDD</td><td>5.11</td><td>Temperature/ Moisture</td><td>Requirements for the Site-Specific Plan Option</td></tr>
<tr><td>40 CFR 63.2282(a)(1), (2)(i), (iv), (b), (c)(1),(2), (4) and (f); Subpart DDDD</td><td>5.12</td><td>HAPs</td><td>Recordkeeping Requirements</td></tr>
<tr><td>AA-111
AA-113</td><td>11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).</td><td>5.13</td><td>Natural Gas Throughput</td><td>Monitor Natural Gas Throughput in the Boilers
(Monthly and Rolling 12-Month Total)</td></tr>
</table>

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to DEQ as required by Applicable Rules and Regulations or this permit upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall monitor the respective emission increase of nitrogen oxides (NO_x), VOCs, and carbon monoxide (CO) as a result of the construction project authorized in the Permit to Construct Air Emissions Equipment issued DATE.

The permittee shall calculate and record the respective pollutant emissions in tons per year (tpy) on a 12-month calendar year basis from all sources affected by the respective construction project for a duration of five (5) years following the resumption of regular operations after the permitted modifications in accordance with 40 CFR 52.21(r)(6)(i)(c); Subpart A.

(Ref.: 40 CFR 52.21(r)(6)(iii); Subpart A)

5.3 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee shall monitor the total throughput of lumber dried within the kilns in thousand board feet (MBF) on both a monthly and a rolling 12-month total basis.

Additionally, the permittee shall utilize the corresponding data (i.e., dried lumber throughput data and VOC emission factors) to calculate and maintain the total emission of VOCs from each kiln in tons on both a monthly and rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

5.4 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee must install, operate, and maintain each temperature monitor (and moisture monitor if applicable) in the lumber kilns according to the following:

(a) The monitor must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.

(b) At all times, the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) The permittee must record the results of each inspection, calibration, and validation check.

(Ref.: 40 CFR 63.2269(a); Subpart DDDD)

5.5 For Emission Points AA-106, AA-109, AA-110, and AA-114, for each temperature monitoring device, the permittee must:

(a) Locate the temperature sensor in a position that provides a representative temperature.

(b) Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.

(c) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.

(d) Validate the temperature sensor's reading at least semiannually using the requirements of 40 CFR 63.2269(b)(4), Subpart DDDD.

(e) Conduct validation checks using the procedures in 40 CFR 63.2269(b)(4), Subpart DDDD any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.

(f) At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

(g) Locate the dry bulb temperature monitor(s) in a position to determine the dry bulb temperature of the heated air that exits the lumber.

(h) Describe the number and location of temperature monitors in the site-specific plan if the facility chooses to comply with the site-specific plan option in Condition 4.3(c).

(Ref.: 40 CFR 63.2269(b) and (m); Subpart DDDD)

5.6 For Emission Points AA-106, AA-109, AA-110, and AA-114, if the permittee chooses to comply with the hybrid option specified in Condition 4.3(b), the lumber moisture content (weight percent, dry basis) must be monitored either within the kiln or at a location after the lumber exits the kiln.

For lumber moisture content measured after the lumber exits the kiln, the permittee must obtain at least one lumber moisture content measurement per twenty thousand board feet (20 MBF or 20,000 BF) of board lumber produced.

For batch kilns with in-kiln moisture monitoring, lumber moisture measurements must be distributed in different areas of the kiln. At least one lumber moisture reading per crib must be obtained.

For continuous kilns with in-kiln moisture monitoring, lumber moisture measurements must be obtained for each crib of lumber dried.

(Ref.: 40 CFR 63.2269(n); Subpart DDDD)

5.7 For Emission Points AA-106, AA-109, AA-110, and AA-114, if the permittee chooses to comply with the site-specific plan option in Condition 4.3(c), the permittee must include in the site-specific plan a method for monitoring lumber moisture content (weight percent, dry basis) and specify the location of such monitoring within the lumber manufacturing process (for example, at the kiln unloading track, in lumber storage, or at the planer). The permittee must obtain at least one lumber moisture content measurement per twenty thousand board feet (20 MBF or 20,000 BF) of board lumber produced.

(Ref.: 40 CFR 63.2269(o); Subpart DDDD)

5.8 For Emission Points AA-106, AA-109, AA-110, and AA-114, except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation at all times that the lumber kiln is operating. For purposes of calculating data averages, the permittee must not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance.

A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.

(Ref.: 40 CFR 63.2270(b): Subpart DDDD)

5.9 For Emission Points AA-106, AA-109, AA-110, and AA-114, if the permittee chooses to comply with the temperature limit option or the hybrid option in Condition 4.3, the permittee must:

(a) Continuously monitor and record the dry bulb temperature during the kiln drying cycle and record the dry bulb temperature at least once every 15 minutes as specified in Condition 5.5. The readings from multiple dry bulb temperature monitors positioned to determine the temperature of the heated air that exits the lumber may be averaged together to determine the kiln-wide, dry bulb temperature.

(b) For batch kilns, calculate the average from the recorded readings during each batch cycle, and maintain the batch cycle average dry bulb temperature at or below the maximum temperature limits specified in either Condition 4.3(a) or (b), whichever applies.

(c) For continuous dry kilns, calculate the daily block average from the recorded readings and maintain the daily block average dry bulb temperature at or below the maximum temperature limits specified in either Condition 4.3(a) or (b), whichever applies.

(Ref.: 40 CFR 63.2270(h)(1); Subpart DDDD)

5.10 For Emission Points AA-106, AA-109, AA-110, and AA-114, if the permittee chooses to comply with the hybrid option in Condition 4.3, the permittee must:

(a) Use the lumber moisture content measurement data collected according to Condition 5.6, calculate and record the semiannual average kiln-dried lumber moisture content for lumber with a given moisture specification produced at the facility.

(b) Compare the semiannual average lumber moisture content for each moisture specification produced at the facility to the applicable minimum kiln-dried moisture content limits included in Table 11 to Subpart DDDD to determine compliance.

(Ref.: 40 CFR 63.2270(i); Subpart DDDD)

5.11 For Emission Points AA-106, AA-109, AA-110, and AA-114, if the permittee chooses to comply with the site-specific plan option in Condition 4.3, the permittee must:

(a) Continuously monitor the temperature parameter (such as wet or dry bulb temperature, wet bulb depression, or temperature drop across the load) specified in the site-specific plan.

(b) Record the temperature parameter at least every 15 minutes and calculate the 3-hour block average for comparison to the site-specific temperature limit.

(c) Calculate and record the monthly and semiannual average kiln-dried lumber moisture content using the lumber moisture content measurement data collected.

(d) Compare the monthly average lumber moisture content to the minimum kiln-dried lumber moisture content limit included in the site-specific plan based on Condition 4.3(d) and Table 11 to Subpart DDDD.

(e) Take corrective action if the monthly average lumber moisture content is below the minimum lumber moisture content limit in the site-specific plan.

(f) Maintain records of corrective actions taken and report corrective actions in the semiannual report required by Condition 6.4.

(g) Compare the semiannual average kiln-dried lumber moisture content to the minimum lumber moisture content limit included in the site-specific plan based on Condition 4.3(d) and Table 11 to Subpart DDDD to determine compliance.

(Ref.: 40 CFR 63.2270(h)(2) and (j); Subpart DDDD)

5.12 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee must keep the following records:

(a) A copy of each notification and report that was submitted to comply with Subpart DDDD

(b) The date, time, and duration of each startup and/or shutdown period.

(c) Actions taken to minimize emissions in accordance with Condition 4.4, and any corrective actions taken to return the kilns to its normal or usual manner of operation.

(d) Records required in Section 4 to show continuous compliance with each work practice requirement.

(e) For each CMS, records described in 40 CFR 63.10(b)(2)(vi) through (xi) and previous (i.e., superseded) versions of the performance evaluation plan, with the program of corrective action included in the plan required under 40 CFR 63.8(d)(2).

(f) Records of the date and time that each deviation started and stopped, and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(g) The written CMS quality control procedures required by 40 CFR 63.8(d)(2) on record for the life of the kiln or until the kiln is no longer subject to the provisions of Subpart DDDD, to be made available for inspection, upon request, by the MDEQ. If the performance evaluation plan is revised, the permittee must keep previous (i.e., superseded) versions of the performance evaluation plan on record to be made available for inspection, upon request, by the MDEQ, for a period of 5 years after each revision to the plan. The program of corrective action should be included in the plan required under 40 CFR 63.8(d)(2).

(Ref.: 40 CFR 63.2282(a)(1), (2)(i), (iv), (b), (c)(1),(2), (4) and (f); Subpart DDDD)

5.13 For Emission Points AA-111 and AA-113, the permittee shall monitor the total natural gas throughput in both boilers in million standard cubic feet (MMscf) on both a monthly and a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

SECTION 6. REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(a)	Report deviations within five (5) working days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(b)	Semiannual reporting
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(c)	Certification by responsible official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(d)	Notification of beginning actual construction within 15 days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(e)	Notification when construction does not begin or is suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(f)	Certification of completion of construction prior to operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(g)	Notification of changes in construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.2	Submit a Semi-Annual Monitoring Report
	40 CFR 52.21(r)(6)(v); Subpart A	6.3	Submit Calculated Annual Emissions (As Applicable)
AA-106 AA-109 AA-110 AA-114	40 CFR 63.2281(c)(1)-(3), (7), (8), and (11); Subpart DDDD	6.4	Submit a Semi-Annual Monitoring Report
	40 CFR 63.2281(e); Subpart DDDD	6.5	Submit a Semi-Annual Deviations Report

6.1 General Reporting Requirements:

(a) The permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

(b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31st and January 31st for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 2.1.C. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

(c) Any document required by this permit to be submitted to the DEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

(d) Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

(e) The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

(f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

(g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

6.2 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report in accordance with Condition 6.1(b) that contains the following information:

(a) The total throughput (in thousand board feet) of lumber dried within the kilns on a monthly and a rolling 12-month total basis;

(b) The total emission of VOCs (in tons) from each kiln on both a monthly and a rolling 12-month total basis; and

(c) The total natural gas throughput (in million standard cubic feet) in the boilers on a monthly and a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

6.3 For Emission Point AA-000 (Facility-Wide), the permittee shall submit an annual report to the MDEQ no later than March 1 (or February 29 when applicable) of each year for the preceding 12-month calendar year that contains the information specified in paragraphs (a) through (c) of this condition **if** the calculated annual emissions required by Condition 5.2 either exceed the baseline actual emissions documented for NO_x, VOCs, and CO in the respective pre-construction PSD major modification applicability test by a "significant" amount (as defined in 40 CFR 52.21(b)(23), Subpart A) or differ from the established pre-construction projected emissions presented in the construction permit application received on February 2, 2024 and additional information received on September 12, 2024, April 9, 2025, and April 15, 2026.

(a) The name, address, and telephone number of the facility;

(b) The calculated annual emissions as specified in Condition 5.2; and

(c) Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the established pre-construction projections).

(Ref.: 40 CFR 52.21(r)(6)(iii); Subpart A)

6.4 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee shall submit a semi-annual monitoring report in accordance with Condition 6.1(b) that contains the following information:

(a) Company name and address.

(b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(c) Date of report and beginning and ending dates of the reporting period.

(d) If there are no deviations from any applicable work practice requirements, a statement that there were no deviations from the work practice requirements during the reporting period.

(e) If there were no periods during which the continuous monitoring system (CMS), including CPMS, was out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.

(f) A description of updates to the O&M plan made during the reporting period, as required in Condition 4.2(d).

(g) If complying with the dry bulb temperature limit option in Condition 4.3(a), note the applicable maximum dry bulb temperature limit according to kiln type, and report deviations from the dry bulb temperature limit batch cycle average (for batch kilns) or daily block average (for continuous kilns) calculated according to Condition 5.9.

(h) If complying with a site-specific temperature limit under a site-specific plan in Condition 4.3(c)(1), note the site-specific temperature parameter limit, and report deviations from the 3-hour block average temperature parameter limit included in the site-specific plan calculated according to Condition 5.11.

(i) If complying with the hybrid option in Condition 4.3(b), note the applicable maximum dry bulb temperature limit according to kiln type, report deviations from the dry bulb temperature limit batch cycle average (for batch kilns) or daily block average (for continuous kilns) calculated according to Condition 5.9, and report the semiannual average lumber moisture content determined according to Condition 5.10.

(j) If complying with a site-specific approach for monitoring kiln-dried lumber moisture content under a site-specific plan in Condition 4.3(c)(2), describe the lumber moisture monitoring method and location and note the site-specific minimum kiln-dried lumber moisture content limit included in the site-specific plan. Report corrective actions taken as a result of monthly lumber moisture content averages (determined according to Condition 5.11) that are below the minimum lumber moisture content limit in the site-specific plan. Report the semiannual average kiln-dried lumber moisture content value determined according to Condition 5.11.

(Ref.: 40 CFR 63.2281(c)(1)-(3), (7), (8), and (11); Subpart DDDD)

6.5 For Emission Points AA-106, AA-109, AA-110, and AA-114, the permittee shall submit a semi-annual monitoring report in accordance with Condition 6.1(b) that contains the information below for each deviation from a work practice requirement where a CMS is used to comply. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.

(a) The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.

(b) The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).

(c) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; or during another period.

(d) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.

(e) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, process problems, other known causes, and other unknown causes.

(f) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.

(g) A brief description of the process units.

(h) A brief description of the CMS.

(i) The date of the latest CMS certification or audit.

(j) A description of any changes in CMS, processes, or controls since the last reporting period.

(k) The total operating time of each affected source during the reporting period.

(Ref.: 40 CFR 63.2281(e); Subpart DDDD)